



HON. SYLVIA O. HINDS-RADIX
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August 25, 2022

VIA ECF

Hon. John G. Koeltl
U.S. District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

The time to respond to the complaint is extended to November 27, 2022. The conference scheduled for October 6, 2022 is cancelled. SO ORDERED.

Aug. 26, 2022 /s/ John G. Koeltl
New York, NY John G. Koeltl, U.S.D.J.

Re: *J.P. v. New York City Dep't of Educ.*, 22-cv-6698 (JGK)(OTW)

Dear Judge Koeltl:

I am a Special Assistant Corporation Counsel in the office of the Corporation Counsel, the Hon. Sylvia O. Hinds-Radix, newly assigned counsel for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs, and expenses for legal services regarding an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.*, as well as for this action.

I am writing to respectfully request a 90-day extension of the time for Defendant to respond to the Complaint, from August 29, 2022 to November 27, 2022, and for the initial conference currently scheduled for October 6, 2022 to be adjourned *sine die*. Plaintiff consents to this request. The parties hope to resolve this case without the need for conferences, discovery, or motion practice and the requested extension will give the City sufficient time to complete its internal review process and begin settlement negotiations. This office has successfully settled all of the dozens of IDEA fees-only cases brought by Plaintiff's counsel in recent years without burdening the Court with any motion practice or conferences, and we see no reason why this case will not follow the same course.

Thank you for considering this request.

Respectfully submitted,

Pasquale Viscusi, Esq. (PV 8588)
Special Assistant Corporation Counsel

cc: Adam Dayan, Esq. (via ECF)